

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROBERT F. URBANO,
Plaintiff,

CASE NO: 05SP01651


vs.

AQUA INVESTMENTS LLC
et als., Defendants.

MOTION TO AMEND
PLAINTIFF'S
COMPLAINT

MOTION TO AMEND PLAINTIFF'S COMPLAINT

Plaintiff hereby moves this Court to amend his Complaint pursuant to MGL c. 93A in order to serve a demand letter. See Tarpey v. Crescent et als., 47 Mass. App. 380, 391-392 (1999) and attached demand letter.

 Dated 8/19/05
Robert F. Urbano - Pro Se
PO Box 164 Rockport MA 01966
978-526-1519

CERTIFICATE OF SERVICE

Plaintiff certifies that on 8/19/05 he served a true copy of the within Motion on Defendants' Attorney Todd J. Bennett Esq. 404 Main St Suite One, Wilmington MA 01887 by certified mail return receipt prepaid.



August 18, 2005

Todd J. Bennett Esq.
404 Main St Suite One
Wilmington, Mass.

Re: Urbano v. Aqua Investments et als 05SP01651

This is a demand letter pursuant to MGL c. 93A sec. 9 whereby I make written demand for relief outlined in the Statute:

1. I rely on Tarpey v. Crescent et als., 47 Mass. App. 380, 391-392 (1999) in order to file a demand letter and amend the Complaint.
2. Defendants and the Court are referred to the Complaint delineating Defendants plenary violations of federal and state landlord/tenant laws and regulations.
3. Plaintiff will settle for ten thousand dollars (\$10,000.00) reflecting the mandatory cash awards as well as other cash awards to Plaintiff that may be awarded by the Court. The settlement does not include compensatory and/or punitive damages possibly imposed by a jury. Plaintiff takes into consideration the possibility of multiple damages under 93A.
4. Chapter 93A gives you an opportunity to make a good-faith response to this demand letter within thirty (30) days. Your failure to so could subject you to triple damages and costs.



Robert F. Urbano - Pro Se
PO Box 164 Rockport MA 01966
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cc: US District Court